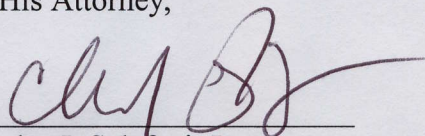


Defendant's prior criminal behavior, and the factors enumerated in U.S.S.G. §§ 3553 and 5K2.0.

The defendant would have no objection to a \$100.00 mandatory special assessment.

Respectfully Submitted,
The Defendant, Roman Zhirnov,
By His Attorney,



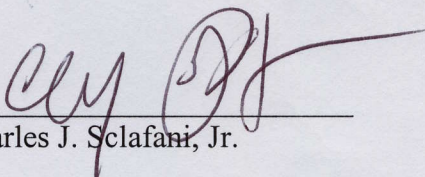
Charles J. Sclafani, Jr.
BBO# 550411

Date: March 23, 2006

Johnson & Sclafani
776 Westfield Street
West Springfield, MA 01089
413-732-8356
413-439-0480 FAX

CERTIFICATE OF SERVICE

I, Charles J. Sclafani, Jr., attorney for the Defendant, Roman Zhirnov, hereby certify that on this 24th day of March, 2006 I served a copy of the foregoing **DEFENDANT ROMAN ZHIRNOV'S MEMORANDUM IN SUPPORT OF MOTION FOR DOWNWARD DEPARTURE AND SENTENCING MEMORANDUM** by in hand delivery to Assistant United States Attorney, Kevin O'Regan, Federal Building & Courthouse, 1550 Main Street, Springfield, MA 01103 and by facsimile on this 21st day of April 2005 and to United States Probation Officer Richard Rinaldi, Federal Building & Courthouse, 1550 Main Street, Room 12, Springfield, MA 01103



Charles J. Sclafani, Jr.